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District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PATRICK CANNON,)	Case No. 2:18-cv-00470-KJD-CWH
Plaintiff,)	
)	
v.)	JOINT STIPULATION FOR EXTENSION OF
)	TIME AND [PROPOSED ORDER]
NANCY A. BERRYHILL,)	
Acting Commissioner of Social Security,)	(THIRD REQUEST)
Defendant.)	

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from January 8, 2018 to **January 29, 2019**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. On Christmas Day, Counsel's family members were in a serious car accident that required hospitalization. As a result, Counsel was unexpectedly out of the office following the Christmas holiday. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until mid-March. Counsel also has a Ninth Circuit brief due on the same date as the current filing deadline. Due to Counsel's heavy workload and unexpected leave,

1 Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's
2 Motion for Summary Judgment. Defendant makes this request in good faith with no intention to
3 unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be
4 modified accordingly.
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7 Respectfully submitted,

8 Dated: January 8, 2019

/s/ *Cyrus Safa
(*as authorized by email on January 7, 2019)
CYRUS SAFA
Attorney for Plaintiff

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12 Dated: January 8, 2019

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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19 **ORDER**

20 APPROVED AND SO ORDERED:

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23 DATED: January 9, 2019



HON. CARL J. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

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CM/ECF:

Attorneys for Plaintiff

Respectfully submitted this 7th day of January 2019

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney